

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
(at Boston)**

<hr/> IN RE: NEW ENGLAND)	Master File No. 1:13-MD-2419-FDS
COMPOUNDING PHARMACY,)	MDL Docket No. 2419
INC. PRODUCTS LIABILITY)	This Document Relates To:
LITIGATION)	<i>All Cases</i>

**GDC PROPERTIES MANAGEMENT, LLC’S MOTION FOR LEAVE TO FILE A
BRIEF IN OPPOSITION TO THE TENNESSEE CLINIC DEFENDANTS’ JOINDER IN
THE PSC’S MOTION TO PARTIALLY LIFT THE DISCOVERY STAY**

GDC Properties Management, LLC (“GDC”), respectfully seeks leave to file a brief in opposition to the Tennessee Clinic Defendants’ joinder in the PSC’s motion to partially lift the discovery stay (“Motion to Partially Lift Stay”). (MDL Dkt. ## 534, 1041.)

On April 1, 2014, Ameridose, LLC (“Ameridose”), filed a motion for leave to file a reply to the Tennessee Clinic Defendants’ joinder in the PSC’s Motion to Partially Lift Stay. (MDL Dkt. # 1046, Ameridose’s Motion for Leave.) GDC hereby joins in and incorporates by reference Ameridose’s Motion for Leave in its entirety. GDC specifically notes that the Tennessee Clinic Defendants’ joinder is untimely; their statement that this MDL “cannot progress” unless they obtain certain unidentified discovery from the affiliated defendants is unsupported and should not be permitted to go unchallenged; and GDC should be permitted an opportunity to explain why the Tennessee Clinic Defendants, like the PSC, have not carried their burden of proving that the stay should be lifted.

Therefore, for those reasons and for all the reasons stated in Ameridose’s Motion for Leave, GDC respectfully requests leave to file a brief in opposition to the Tennessee Clinic Defendants’ joinder in the PSC’s Motion to Partially Lift Stay.

Dated: April 2, 2014

Respectfully submitted,

/s/ Joshua A. Klarfeld

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been filed with the Clerk of the Court on April 2, 2014 using the CM/ECF system which sent notification of this filing to all ECF registered counsel of record via e-mail generated by the Court's ECF system.

/s/ Joshua A. Klarfeld